

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

WINIFRED BLACKLEDGE

Plaintiff,

vs.

CASE No.: CV 2:06-CV-321-SRW

**ALABAMA DEPARTMENT OF
MENTAL HEALTH & MENTAL
RETARDATION & COMMISSIONER
JOHN HOUSTON, in his Official
Capacity as Commissioner.**

Defendants.

SPECIAL INTERROGATORIES TO THE JURY AND VERDICT FORM

Do you find from a preponderance of the evidence:

1. That the Plaintiff's race was a substantial or a motivating factor in the denial of the CSS III Position?

Answer Yes or No _____

2. That the Plaintiff's race was a substantial or a motivating factor in the denial of the PQA II Position in 2002?

Answer Yes or No _____

3. That the Plaintiff's race was a substantial or a motivating factor in the denial of the PQA II Position in 2004?

Answer Yes or No _____

[Note: If you answered Yes to either question 1, question 2, and/or question 3, then you may proceed to Questions 4 and 5].

4. Do you find that the Plaintiff should be awarded damages to compensate for a net loss of wages and benefits to the date of trial?

Answer Yes or No _____

If your answer is Yes,
in what amount? \$ _____

5. Do you find that the Plaintiff should be awarded damages to compensate for emotional pain and mental anguish?

Answer Yes or No _____

If your answer is Yes,
in what amount? \$ _____

Foreperson

DATED: _____

Respectfully submitted,

/s/ Joshua D. Wilson
Joshua D. Wilson
Attorney for the Plaintiff

OF COUNSEL:
WIGGINS, CHILDS, QUINN & PANTAZIS, LLC
The Kress Building
301 19th Street North
Birmingham, Alabama 35203
Phone: (205) 314-0500

CERTIFICATE OF SERVICE

I do hereby certify that I have filed a copy of the above and foregoing by filing the same with the EC/CMF system, which will provide notification to the following:

TROY KING
ATTORNEY GENERAL

COURTNEY W. TARVER
Deputy Attorney General and General Counsel
State of Alabama Department of
Mental Health and Mental Retardation
RSA Union Building
100 N. Union Street
P.O. Box 301410
Montgomery, Alabama 36130-1410
Phone: (334) 242-3038
Fax: (334) 242-0924

This the 11th Day of February, 2008.

/s/ Joshua D. Wilson
Of Counsel